

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

**KYLE TOUCHSTONE,
MELISSA KUSALONIS,
aka "Mel," "Liss,"**

**CHARLES ADAMS,
aka "Chuck,"**

Defendants.

) Criminal No. 8:17-CR-137 (MAD)

) **Indictment**

) Violations: 21 U.S.C. §§ 846, 841(a)(1),
) 841(b)(1)(B), 841(b)(1)(C)
) [Conspiracy to Possess with
) Intent to Distribute and to
) Distribute a Controlled
) Substance]; 21 U.S.C.
) §§ 841(a)(1), (b)(1)(C)
) [Possession with Intent to
) Distribute a Controlled
) Substance]

) **2 Counts**

) County of Offense: Clinton and Essex

THE GRAND JURY CHARGES:

COUNT 1

**[Conspiracy to Possess with Intent to Distribute
and to Distribute a Controlled Substance]**

Between in or about June 2016 and May 25, 2017, in Clinton County in the Northern
District of New York, and elsewhere, the defendants, **KYLE TOUCHSTONE, MELISSA**

KUSALONIS, aka "Mel," "Liss," [REDACTED]

and **CHARLES**

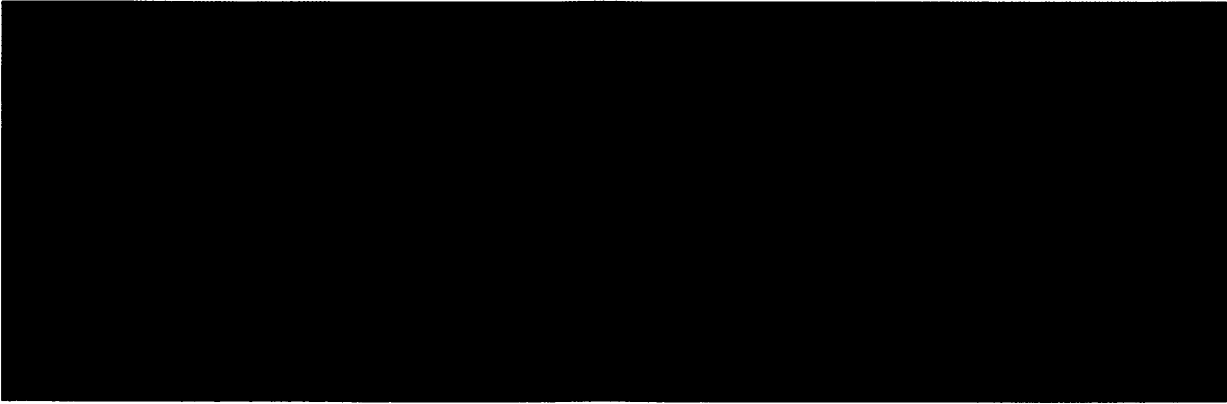
ADAMS, aka "Chuck," and others known and unknown conspired to knowingly and
intentionally possess with intent to distribute and to distribute a controlled substance, in violation
of Title 21, United States Code, Sections 846 and 841(a)(1). As to defendants, **KYLE**
TOUCHSTONE, MELISSA KUSALONIS, aka "Mel," "Liss," [REDACTED]

On or about May 25, 2017, in Essex County in the Northern District of New York, the defendant, **CHARLES ADAMS, aka “Chuck,”** knowingly and intentionally possessed with intent to distribute a controlled substance, in violation of Title 21, United States Code, Section 841(a)(1). That violation involved heroin, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(b)(1)(C).

The defendants, **KYLE TOUCHSTONE** and [REDACTED]
[REDACTED] are subject to increased punishment, pursuant to Title 21, United States Code, Section 841(b)(1)(B), because of the following prior convictions for felony drug offenses which have become final:

KYLE TOUCHSTONE was convicted in the County Court for Clinton County, New York, of Criminal Sale of a Controlled Substance in the Third Degree, in violation of N.Y. Penal Law § 220.39(1), a class B felony, on or about March 20, 2013, and sentenced to 3 years of imprisonment and 2 years of post-release supervision on or about May 30, 2013.

2



Dated: June 14, 2017

A TRUE BILL,

*name redacted

Grand Jury Foreperson

RICHARD S. HARTUNIAN
United States Attorney

By:

A handwritten signature in black ink, appearing to read 'P. Rieck', written over a horizontal line.

Cyrus P.W. Rieck
Katherine Kopita
Assistant United States Attorneys
Bar Roll Nos. 518933, 517944